



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

JUN 02 2015

Ms. Tammie Hynum
Division Manager
ADEQ Hazardous Waste Division
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

Dear Ms Hynum:

This letter follows the U.S. Environment Protection Agency (EPA) Region 6's midyear review of the ADEQ's Resource Conservation and Recovery Act (RCRA) hazardous waste program conducted with your staff via conference call on May 06, 2015. This review documented the state's progress toward meeting the negotiated 2015 work plan commitments in the Arkansas RCRA, Subtitle C, Section 3011 Cooperative Agreement.

Region 6 is pleased that Arkansas met, and in some areas exceeded, 2015 grant commitments. In the area of permitting and permit renewal, ADEQ is 100 percent permitted, and has no backlog of renewals.

We wish to acknowledge the State's timely reporting. Receiving complete reports on time helps EPA provide effective oversight and increases collaboration among my staff and their state counterparts.

The EPA is committed to continuing to work with the ADEQ to provide technical support and training, as needed.

We congratulate you and your staff for your hard work and commitment to protecting the environment and health of the people of Arkansas. If you have any questions after reviewing the enclosures, please call me, at (214) 665-8022.

Sincerely,

A handwritten signature in cursive script, appearing to read "Susan Spalding", is written over a horizontal line.

Susan Spalding
Associate Director for RCRA
Multimedia Planning and Permitting Division

cc:

Ms Penny Wilson, ADEQ
Ms. Tamara Almand, ADEQ
Mr. Jay Rich, ADEQ

ATTACHMENT A
6PD RCRA PROGRAM REVIEW CHECKLIST

Mid-Year FY 2015

Date of Evaluation: May 2015

Program: RCRA Section 3011 Hazardous Waste Management Program

Delegated State: Arkansas Department of Environmental Quality

Grant #: D-00625115-1

EPA Contacts:
Program Manager: Susan Spalding
Grants/Project Officer: Monica Wilson
Technical Assistance Coordinator: Nancy Fagan

State Contacts: Tamara Almand, Tammie Hynum

PROGRAM REVIEW INITIATOR	STATUS	EPA COMMENTS & RECOMMENDATIONS
SECTION 1: COOPERATIVE AGREEMENT PROCESS		
1a) Annual grant commitments	On-going.	ADEQ is currently up to date.
1b) Grant funds used appropriately.	ADEQ's drawdowns of grant funds are being used appropriately.	ADEQ effectively used all allocated funds for FY14. ADEQ is effectively using its current allocation of FY15 funds.
1c) Timeliness and completeness of QAPP and QMP	ADEQ's QMP and QAPPs are both valid at the time of the midyear and are submitted and approved within a timely manner.	The state's QMP was received February 25, 2015, was approved as submitted, and is valid until February 26, 2016. The state's QAPP was received July 31, 2014, was approved as submitted, and is valid until September 30, 2015.
1d) Timeliness and completeness of reports	The Midyear Report was submitted in a timely manner.	The End Of Year report for FY 14 was received October 16, 2014. ADEQ submitted its mid-year report March 26, 2015.
1e) Any changes that may impact implementation of RCRA program reported to the EPA in a timely manner	No changes have been made that may impact implementation of the RCRA program.	None
1f) Staff training performed and reported to the EPA	ADEQ provided EPA comprehensive list of training provided to staff during grant year FY15.	EPA Region 6 has developed Standard Authorization Operating Procedure (SOP) to assist Region 6 States in preparation of RCRA C Authorization application. ADEQ was the first State that EPA provided staff training on December 12-13, 2014. Incorporated in the training was discussion of who the SOP supports the LEAN approach in processing Subtitle C State Authorization. ADEQ documented 67 trainings staff participated in during this mid-year period.

SECTION 2: AUTHORIZATION PROCESS

2a) State is authorized for current RCRA Rules Clusters	Portions of RCRA Clusters XX through XXI	The State's authorization became effective on December 30, 2014.
2b) Timeliness and completeness of authorization packages	<p>RCRA Cluster XX and XXI</p> <p>The EPA has already published portions RCRA Clusters XX and XXI on October 31, 2014.</p>	<p>The rules in RCRA Clusters XX through XXI are: 1. Universal Waste Rule: Specific Provisions for Mercury Containing Equipment, 2. Final replacement Standards and Phase II), 3. Cathode Ray Tubes Rule, 4.OECD Requirements, Export Shipments of Spent Lead-Acid Batteries, 5. Hazardous Waste Technical Corrections and Clarification, 6. Removal of Saccharin and its Salts from the Lists of Hazardous Wastes, 7. Academic Laboratories Generator Standards Technical Corrections and, 8. Revision of the Land Disposal Treatment Standards for Carbamate Wastes.</p>

2c) Meets authorization requirements

RCRA Clusters XX and XXI

RCRA Cluster XXIII: is due the Region by September 30, 2015.

The final authorization for RCRA Clusters XX through XXI is September, 2015.

The State has adopted rules in RCRA Cluster XXIII which are: Conditional Exclusions for Solvent Contaminated Wipes, Conditional Exclusion for Carbon Dioxide (CO2) Streams in Geologic Sequestration Activity, Hazardous Waste Electronic Manifest Rule and Revisions to the Export Provisions of the Cathode Ray Tube (CRT) Rule.

SECTION 3: TECHNICAL ASSISTANCE/REVIEW PROCESS

3a) Permits reviewed to document if they are consistent with federal requirements; the review includes: public participation requirements, financial assurance (including cost estimates for closure/post-closure care) and compliance schedules.	EPA plans to conduct review of Future Fuels permits in the next few weeks.	No comments
3b) Progress on permits listed on the renewal baseline.	ADEQ has no outstanding permit renewals	EPA will be using the 2018 Baseline to track permit renewal progress. ADEQ has 14 permit renewals that expire by the end of 2018 on the baseline.
3c) Additional permits reviewed.		
3d) Corrective Action documents are reviewed for technical and programmatic consistency with federal requirements.		<p>EPA is still planning on providing its half-day IC/EC training to ADEQ project managers, contingent on FY15 travel funding and staff availability.</p> <p>EPA continues to coordinate with ADEQ staff on formerly used defense (FUD) site investigations and cleanup at Camp Robinson and Southwestern Proving Ground.</p>
3e) Corrective Action progress	During the first half of the grant year, no Ready for Reuse candidate facilities were identified, and no new area-or facility-wide Ready for Anticipated Use (RAU) determinations were coded in RCRAInfo.	ADEQ leads the Region in GPRA corrective action accomplishments with 100% Human Exposures controlled; 93% Contaminated Ground Water Controlled; 93% Remedies Selected and 80 % Remedies Constructed

Parker Solvents has completed RFI work and reported results per the 3013(a) Order issued by EPA in 2013. EPA is now working on a draft 3008(h) to address remediation at the site and to comply with GPRA 2020 goals. Draft to be completed in early June and will be shared with ADEQ for comment.

EPA Region 6 provided RCRA Fundamentals training to ADEQ staff on March 17-18, 2015

35 ADEQ staff attended and completed the training.

SECTION 4: DATA MANAGEMENT PROCESS

<p>4a) Updates databases in a timely manner</p>	<p>ADEQ enters information into the RCRAInfo database in a timely manner.</p>	<p>Updates to the expired mechanisms in the Financial Assurance module of RCRAInfo have been noted.</p> <p>ADEQ's responsiveness to cleaning up historical permitting data in RCRAInfo on 2018/2020 GPRA Baseline facilities has enabled us to avoid many of the system reporting issues we've previously experienced when trying to account for accomplishments.</p> <p>Please note, Region 6 is in the process of performing comprehensive reviews of historical data in all RCRAInfo modules for each state and will work with ADEQ to research and make corrections as needed. Region 6 will continue to work with ADEQ to address any data concerns or technical issues with uploading or entering the data into RCRAInfo that may arise. At this time, there are no issue with ADEQ's RCRAInfo data.</p>
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SECTION 5: SUSTAINABILITY PROGRAMS

5a) Evaluation of sustainability programs

ADEQ promotes pollution prevention and sustainability through its leadership program called the Arkansas Environmental Stewardship Award (ENVY). The ENVY award is presented annually to winners at the APC&E Commission's Meeting.

ADEQ participates in pollution prevention and sustainability conference calls with EPA and other States in Region 6.

EPA is in its 4th year of implementing the Federal Green Challenge (FGC) as part of the Sustainable Materials Management Program. There is currently 1 federal facility in Arkansas participating in the FGC (the Little Rock post office and courthouse building).

Region 6 continues to promote Green Sports, encouraging sustainable practices such as recycling foods recovery/donation at sports venues.

RCRA State Sustainability Network calls resumed in 2015 to foster sustainability across the Region and support both EPA and state environmental and leadership programs.

Since these are voluntary programs, a state's participation is much appreciated and all state efforts will be viewed as enhancements to the overall RCRA program.

STATE SPECIFIC ISSUES			

FOLLOW-UP

ACTION ITEM	AGENCY RESPONSIBLE	DUE DATE
Sampling Training	EPA/EN	TBD
IC/EC Training	EPA/Jeanne Schulze	TBD
RCRA Fundamentals Training	EPA	Completed/March 17-18, 2015
Authorization Training	EPA	Completed/December 12-13, 2015
Basic Inspector Training	EPA	TBD

STATE OF ALABAMA
RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) - HAZARDOUS WASTE GRANT PROGRAM
2015 Mid-Year Report for D-00625115-1

PROGRAM ELEMENT #1 - AUTHORIZATION (15.30 million allocated for Element #1)

PROGRAM ELEMENT #1- AUTHORIZATION

Objectives: The authorization of States for revisions to the RCRA Subtitle C program supports the Agency objectives of safe waste management and cleanup at hazardous waste sites. The State and EPA maintain a strong commitment to the authorization of State programs, the enhancement of the State and Federal relationship, and to ensure full adoption and authorization for RCRA rules, as soon as possible, and:

1. Promote the Express Authorization initiative so that it is widely used by States by providing timely implementation assistance to States.
2. Reduce barriers to authorization, thereby expediting the authorization process.

Performance Measure: Rules adopted and checklists submitted for authorization demonstrate the State's commitment to participation in the RCRA program. The ADEQ and EPA will view rule adoption and authorization as measures of success.

Activity A: EPA/State Authorization Coordination Activities

- Task 1:** During the year, EPA and ADEQ will actively participate in identifying problems and developing solutions and strategies for the authorization process.
- Task 2:** The ADEQ will support EPA's codification of ADEQ's authorized hazardous waste program.

Activity B: Maintain Equivalency to the Federal Program

- Task 1:** The ADEQ will maintain equivalency to the Federal program during ADEQ-initiated program modifications - statutory, regulatory, and administrative.
- Task 2:** The ADEQ will notify EPA within sixty (60) days of any State legislation changes that could become a national concern or impact the State's authorized program. The State will submit to EPA regulatory changes and State-initiated program modifications - statutory, regulatory, and administrative.

Activity C: EPA Review of Authorization Applications

- Task 1:** The State will adopt revisions components of RCRA Cluster XXII and XXIII.
- Task 2:** EPA shall review draft applications and provide a complete set of comments on the same to ADEQ within forty-five (45) days of receipt of the application.
- Task 3:** Within 45 days after receipt of EPA's comments on the draft application for RCRA Cluster XXII and XIII, and if there no regulatory deficiencies ADEQ will prepare and submit a final application to EPA for authorization of these clusters.
- Task 4:** EPA shall initiate the necessary actions to publish the decision on a final application within forty-five (45) days of the receipt of all responses to comments and settlement of any associated issues for that application.

EPA MID-YEAR COMMENTS:

At the mid-year, the EPA Region 6 sent a letter on February 10, 2015, to the State notifying the State the final authorization for RCRA Clusters XX through XXI under the RCRA program. The authorization was effective on December 30, 2014. The final rules in RCRA Clusters XX through XXI are: 1. Universal Waste Rule: Specific Provisions for Mercury Containing Equipment, 2. Final replacement Standards and Phase II), 3. Cathode Ray Tubes Rule, 4. OECD Requirements, Export Shipments of Spent Lead-Acid Batteries, 5. Hazardous Waste Technical Corrections and Clarification, 6. Removal of Saccharin and its Salts from the Lists of Hazardous Wastes, 7. Academic Laboratories Generator Standards Technical Corrections and 8. Revision of the Land Disposal Treatment Standards for Carbamate Wastes.

RCRA Cluster XXII: The Federal regulation which the State is to adopt in RCRA Cluster XXII "Hazardous Waste Technical Corrections and Clarifications was due to the Region on September 30, 2013. The State has made correction to the entry for K107 with effective date of August 12, 2012. The State has to also adopt and seek authorization for the Federal language in 40 CFR part 266.20(b).

RCRA Cluster XXIII due September 30, 2015

The State has adopted the Federal rules in RCRA Cluster XXIII and will present the rules to the Commission for approval. The rules in RCRA Cluster XXIII are: Conditional Exclusions for Solvent Contaminated Wipes, Conditional Exclusion for Carbon Dioxide (CO2) Streams in Geologic Sequestration Activity, Hazardous Waste Electronic Manifest Rule and Revisions to the Export Provisions of the Cathode Ray Tube (CRT) Rule. :

PROGRAM ELEMENT #2 - PERMITTING & CLOSURE

Objectives: The strategic goals for permit and closure activities at hazardous waste facilities are:

1. Demonstrate substantial progress in permitting land disposal and combustion facilities as determined by the GPRA permitting list of these facilities.
2. Demonstrate substantial progress in reducing risks at inactive land disposal sites.

Grant funds are provided to the State of Arkansas and ADEQ for managing the RCRA program. Targets in the work plan are one means to measure that progress and are not the only means that the state may use to demonstrate appropriate management of the RCRA program. As the universe of available facilities from which to code targets shrinks, EPA's expectation of annual targets will also shrink.

COMMITMENTS			
Activity	RCRA Info Codes	2015 Targets	FY2015 Midyear Comments
Final Determinations or Permit Modifications Incorporating Unpermitted Units for Combustion Facilities (BIF, Incinerator or Miscellaneous Subpart X Units) <i>[GPRA facilities only]</i>	OP200/OP240 & OP270	1	ADEQ has received one permit modification request to incorporate new Subpart X unit for Clean Harbors El Dorado. This application is under review.
Final Determinations or Permit Modifications Incorporating Unpermitted Units for Land Disposal or Storage Treatment Facilities <i>[GPRA facilities only]</i>	OP200/OP240 & OP270	1	ADEQ will process the permit modification upon submittal.
Final Determinations or Permit Modifications Incorporating Unpermitted Units at Land Disposal Post-Closure Facilities <i>[NON-GPRA facilities]</i>	OP200/OP240 PC200/PC240 & PC270	0	ADEQ is currently up to date on permit activities. There are no commitments for this activity.
Permit Renewals for Combustion Facilities, Land Disposal or Storage Treatment Facilities <i>[GPRA facilities only]</i>	OP200 & OP270	2	ADEQ is currently up to date on permit activities. ADEQ has received 3 permit renewal applications (Austin Power Company, Aerojet Rocketdyne and Pine Bluff Arsenal). These applications are currently under review.
Permit Renewals for Combustion Facilities, Land Disposal or Storage Treatment Facilities or Land Disposal Post-Closure Facilities <i>[NON-GPRA facilities]</i>	OP200/OP270 PC200/PC270	0	ADEQ has received three renewal applications "(Austin Powder Co.; Aerojet Rocketdyne; and Pine Bluff Arsenal) These are currently under review. ADEQ anticipates 2 of these will be completed by the end of this grant period.
Closure Plan Approvals/Certifications/Verifications	CL360/CL380 & PC380	0	ADEQ is currently up to date on permit activities. There are no commitments for this activity.

Footnote: ADEQ will undertake activities, as outlined above, to change GPRA facilities from the category "not under control" to "under control." EPA and ADEQ will confer as needed via conference call to keep up-to-date on permitting issues.

EPA MID-YEAR COMMENTS: ADEQ up to date on permitting targets and does not have a backlog of renewals. In addition to the above accomplishments ADEQ completed 14 class 1 and 3 class 2 permit modifications at various facilities.

PROGRAM ELEMENT 7: CORRECTIVE ACTION (\$250,000 KSA) for Element #3)

Objective: The Corrective Action program has three overriding program goals:

1. Focus program resources and actions at GPRA priority facilities.
2. Maximize actual environmental results.
3. Streamline and accelerate the pace of the program.

RCRA Info Codes	Corrective Action Activity	FY2015 Targets	FY2015 Mid Year Targets Met
CA725	Human Exposures Controlled (total completed by End of Year)	0	ADEQ is currently 100% up to date on CA725. There were no commitments for this activity
CA750	Groundwater Releases Controlled (total completed by End of Year)	0	ADEQ is currently 93% up to date on CA750. There were no commitments for this activity
CA400	<u>Entire Facility Remedy Selected/Corrective Measures Imposed (total completed by End of Year)</u> These were non-GPRA facilities	0	ADEQ is currently 93% up to date on Site-wide CA400.
CA550	<u>Entire Facility Remedy Completed or Construction Completed (total completed by End of Year)</u>	0	ADEQ is currently 80% up to date on CA550. There were no commitments for this activity
	Other EPA and/or State Corrective Action Priorities	2	
CA350 CA375 CA400	Corrective Measures (CMS) Reports Approved Decision on Petition for No Further Action Remedy Selected/CM Imposed (Unit Level)	2	
CA550 CA600 CA650 CA999	Remedy Completed or Construction Completed (Unit Level) Stabilization Measures Implemented Stabilization Measures Completed CA Terminated (Entire Facility) CA Terminated (Entire Facility)	0	
	Other EPA and/or State Corrective Action Priorities	0	ADEQ is currently up to date on corrective action activities. There were no commitments for this activity.

Footnote: ¹ ADEQ reserves the right to trade out the 1 CA 550 corrective action activity listed in "Entire Facility Remedy Selected/Corrective Measures imposed" for other Corrective Action activities that at least equal the man hours committed to in this Program Element.

² Total completed by End of Year

Achievements/Projections for 31 Arkansas Facilities on the Region 6 GPRA 2020 Baseline as related to the 2020 GPRA Region 6 Goals

	FY09	FY11	FY12	FY13	FY14 ¹	FY15 ¹ Midyear	FY20 Goal
CA725 Human Exposures	30/31 (97%)	31/31 (97%)	31/31 (100%)	30/30 (100%)	30/30 (100%)	30/30 (100%)	29 (95%)
CA750 Ground Water	26/31 (84%)	29/31 (90%)	29/31 (94%)	28/30 (93%)	28/30 (93%)	28/30 (93%)	29 (95%)
CA400 Remedy Selection	25/31 (81%)	28/31 (87%)	28/31 (90%)	28/30 (90%)	28/30 (93%)	28/30 (93%)	29 (95%)
CA550 Construction Complete	20/31 (65%)	23/31 (74%)	24/31 (74%)	24/30 (80%)	24/30 (80%)	24/30 (80%)	29 (95%)
CA900/CA999 Performance Standards Attained						14/30 (47%)	8 (25%)
							¹ Actual number of total facilities on baseline Achieving measurement as of 03/31/2015

CORRECTIVE ACTION STREAMLINING AND RE-USE ACTIVITIES WITH ADEQ

Objectives: The corrective action program is now driven by four new site-wide GPRA environmental indicators (EIs): the control of current human exposure (CA725), the control of the migration of contaminated ground water (CA750), remedy selected (CA400) and construction complete (CA550). EPA included the first two indicators as performance objectives for high-priority RCRA facilities to be achieved by the end of FY 2005, and subsequently set a new goal to achieve 95% completion for CA 725 and CA550 corrective action goals by FY 2020. ADEQ has made great progress over the past several years in instituting corrective action streamlining concepts into their cleanup program.

Activity A: Region 6 and ADEQ will continue to work together to further develop and implement practical, innovative, performance- and risk-based corrective action strategies to achieve both State and Federal cleanup goals and priorities. Streamlined approaches used during sampling, analysis, and document submittals will lead to smarter, faster work strategies resulting in long term protective remedies. Lessons learned from these approaches will be used to guide the way data is collected and analyzed for future site cleanup decisions in other state programs and regions.

Activity B: ADEQ will continue to support the RCRA Brownfields and Ready for Re-use programs..

Activity C: Region 6 and ADEQ will work together to implement the new land reuse measures and indicators pursuant to the EPA's February 21, 2007 "Guidance for Documenting and Reporting RCRA Subtitle C Corrective Action Land Revitalization Indicators and Performance Measures."

Activity D: ADEQ will assist Region 6 in obtaining and verifying land reuse measures and indicators information for the 2008 and 2020 GPRA baseline facilities which is not available in the RCRAInfo database. Such information may include:

- Cleanup status (e.g., CA 725, 750, 400, 550, 800, or 999) for site-wide or area-specific determinations;
- Institutional controls and/or engineering controls in place;
- Acres
- Types of use; and
- Status of use

Activity E: ADEQ and EPA will continue to work cooperatively in reviewing Arkansas's identified Federally Utilized Defense (FUD) site investigation and remediation reports. Comments resulting from those reviews will be shared with each other.

EPA MID-YEAR COMMENTS: During the first half of the grant year, no new Ready for Reuse candidate facilities were identified, and no new area-or facility-wide Ready for Anticipated Use (RAU) determinations were coded in RCRAInfo.

EPA is still planning its half-day IC/EC training to ADEQ project managers, contingent on FY15 travel funding.

Objectives: The EPA will transmit all significant guidance documents to ADEQ with a cover letter clearly stating the purpose of the documents. Within forty-five (45) days after receipt, ADEQ will provide EPA a written response identifying any problems with guidance implementation. The EPA and ADEQ will arrive at a solution/decision on guidance implementation pursuant to the EPA/ADEQ Memorandum of Agreement (MOA).

Activity A: Quality Assurance

The ADEQ must submit an updated FY 2015 Quality Assurance Project Plan (QAPP) 60 days prior to October 1, 2014. If there have been no changes to the QAPP from FY 2014, ADEQ must submit a new signature page and documentation stating that the QAPP is current

Activity B: Training

The ADEQ will present the RCRA core curriculum courses or their equivalent as needed for new staff and ensure all ADEQ personnel are kept up-to-date in all new rules and regulations. Training for RCRA inspectors must be provided to ensure compliance with EPA Order 3500.1.

EPA MID-YEAR COMMENTS: The state's FY 2015 QMP was submitted February, 2015, was approved as submitted, and is valid until February 26, 2016, the FY 2015 QAPP was submitted July 31, 2014, was approved as submitted, and is valid until September 30, 2015..

ADEQ provided staff training and ensures that staff maintains required certifications. EPA's opportunities to present training, including authorization, RCRAInfo, and land revitalization, are restricted by the Agency's reduced travel budget. Region 6 is working to create online training where possible.

EPA provided RCRA Fundamentals Training to ADEQ staff March, 17-18. 35 ADEQ staff attended and completed the training.

EPA Region 6 has developed Standard Authorization Operating Procedure (SOP) to assist Region 6 States in preparation of RCRA C Authorization application. ADEQ was the first State that EPA provided staff training on December 12, 2014 through December 13, 2014.

Objective: The ADEQ must maintain RCRAInfo databases in order to provide a complete and accurate picture of program accomplishments. The data retrieved from RCRAInfo should be reliable in order to support RCRA program goals.

The reporting of nationally-required RCRAInfo core elements is essential to properly review and track RCRA program progress at all RCRA-regulated facilities and identify the accomplishment of Government Performance and Results Act (GPRA) goals.

Activity A: RCRAInfo

The ADEQ will enter all quality-assured RCRAInfo data into the EPA database by the seventh working day of each month. The ADEQ should review and improve the current RCRA universes to assure a nationally consistent information base. The ADEQ will make corrections to historical data in RCRAInfo as time and other workload commitments permit.

Activity B: Institutional Control (IC) and Engineering Control (EC) Information

ADEQ will collect, compile, perform quality assurance checks, and upload finished data for the 2013 Biennial Report in accordance with the 2013 Biennial Report National Implementation Schedule.

Activity C: Institutional Control (IC – CA772) and Engineering Control (EC – CA770) Information

ADEQ will continue to enter into RCRAInfo and maintain updates for all institutional control (IC) and engineering control (EC) information necessary to adequately review and track RCRA program progress toward GPRA goals. The objective of collecting and tracking this information is to ensure that remedies implemented remain protective over time.

EPA MIDYEAR COMMENTS: Updates to the Financial Assurance data have been noted. Region 6 appreciates ADEQ's efforts in getting that data updated.

EPA will continue to review the historical RCRAInfo data in all modules for accuracy, work with ADEQ to research and correct the data and provide assistance and training with current data entry as needed. At this time, there are no issues with ADEQ's RCRAInfo data.

Task: ADEQ will conduct required inspections at hazardous waste facilities. This includes, at a minimum, 50% of the TSDF universe, and 100% of the federal TSDF universe. Additionally, ADEQ will inspect 20% of the LQG universe (5 year goal of inspecting all active LQGs), unless ADEQ seeks approval of an alternative inspection plan in accordance with the National Program Managers' Guidance. The LQG universe will be determined based on the information in RCRAInfo no later than August 1 of each year. (As of August 1, 2013, Arkansas's BR LQG universe includes 144 facilities.)

ACTIVITY	FY15 TARGET	Mid-Year ACCOMPLISHMENT
CEIs @ operating Federal TSDF Universe (1)	100% of Universe 1	0
CEIs @ operating non-Federal TSDF Universe (11)	50% of Universe 6	7
CEIs @ non-TSDF LQG Universe (144)	20% of Universe 29	14
Comprehensive Ground-Water Monitoring Evaluation (GME)	1	0
Operation & Maintenance Inspections (O&M)	3	3
CEIs @ non-TSDF SQGs		4
CEIs @ non-TSDF CESQGs		1
Focused Compliance Inspections (FCIs)		8
Non-Financial Record Reviews (NRRs)		43
Financial Record Reviews (FRRs)		13
Corrective Action Compliance Evaluations (CACs)		1
Complaints		27

Objective: Maintain a high rate of compliance in accordance with the EPA Enforcement Response Policy (ERP) by taking timely, visible, and appropriate enforcement action against violators..

EPA MID-YEAR COMMENTS: ADEQ IS MEETING ITS OBJECTIVE TO MAINTAIN A HIGH RATE OF COMPLIANCE IN ACCORDANCE WITH THE EPA ENFORCEMENT RESPONSE POLICY (ERP) BY TAKING VISIBLE AND APPROPRIATE ENFORCEMENT ACTION AGAINST VIOLATORS (6 FORMAL ENFORCEMENT ACTIONS WITH PENALTY AND ALL SNC) AND 61 INFORMAL ENFORCEMENT ACTIONS (8 SNC) AGAINST 56 FACILITIES. ADEQ MADE A TIMELY SNC DESIGNATION FOR ALL ITS ENFORCEMENT ACTIONS. ADEQ MET THE RESPONSE TIME GUIDELINES FOR ALL OF ITS FORMAL AND INFORMAL ENFORCEMENT ACTIONS. ADEQ SUBMITS TIMELY AND APPROPRIATE ALTERNATE ERP SCHEDULES.

ADEQ CONTINUES TO RANK HIGHEST IN THE NATION FOR VIOLATIONS FOUND DURING INSPECTIONS, SNC IDENTIFICATION RATE, AND TIMELINESS OF SNC DETERMINATIONS.

RCRAINFO REPORT "CM&E SNC STATUS REPORT" DATED APRIL 13, 2015, IDENTIFIED 5 UNADDRESSED SNCS WHICH NONE ARE BEYOND THE 360-DAY TIMELINE.

ARD093417525
ARD006338537
ARR000003269
ARR000025916
ARD006354161

AUSTIN POWDER COMPANY, EAST CAMDEN, AR
BALDOR ELECTRIC CO., FORT SMITH, AR
GENERAL DYNAMICS - OTS, INC., HAMPTON, AR
KITCHEN & BATH CABINETS, INC., SILOAM SPRINGS, AR
REYNOLDS METALS COMPANY GUM SPRINGS PLANT, ARKADELPHIA, AR

DAY ZERO: 3/12/2015
DAY ZERO: 12/2/2014
DAY ZERO: 1/6/2015
DAY ZERO: 2/26/2015
DAY ZERO: 2/10/2015